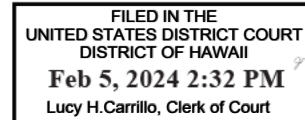


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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

In Re:	)	MISC. NO. <b>24-00104 LEK-KJM</b>
	)	
\$76,354.00 IN U.S. CURRENCY	)	STIPULATED MOTION TO
SEIZED BY THE DEA FROM	)	EXTEND TIME TO FILE
WILLIAM NAWELI AKA WILLIAM	)	COMPLAINT FOR FORFEITURE
GILLMAN, IN KAHULUI, HAWAII	)	
ON OR ABOUT JULY 20, 2023.	)	
	)	

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STIPULATED MOTION TO EXTEND  
TIME TO FILE COMPLAINT FOR FORFEITURE

Pursuant to 18 U.S.C. § 983(a)(3)(A), the United States of America and Claimant William Naweli, by and through the undersigned attorneys, jointly move the Court for a 90-day extension of the time within which the United States is required to file a civil forfeiture complaint against the above-captioned \$76,354.00

in U.S. Currency, seized by the DEA from William Naweli in Kahului, Hawaii on or about July 20, 2023 (the “Subject Property”);

The parties hereby agree and stipulate to the following:

1. The Subject Property was seized by the Drug Enforcement Administration (“DEA”) on or about July 20, 2023.
2. The DEA initiated forfeiture proceedings against the Subject Property, pursuant to 21 U.S.C. § 881, and the required forfeiture notices were sent to all known interested parties, including William Naweli, in accordance with 18 U.S.C. § 983.
3. William Naweli filed a timely claim to the Subject Property, which was received by the DEA on November 21, 2023.
4. No other claims have been filed or received, and the time has expired for any person to file a claim to the Subject Property under 18 U.S.C. § 983(a)(2)(A)-(E).
5. 18 U.S.C. § 983(a)(3)(A) provides as follows:  
  
(A) Not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.

(emphasis added).

6. The United States currently is required to file a civil forfeiture complaint against the Subject Property on or before February 19, 2024 (90 days after the claim was received on November 21, 2023).

7. The parties believe that additional time would further judicial efficiency and avoid the unnecessary expenditure of funds and resources by the parties and the Court. Accordingly, the parties agree to and request a 90-day extension of the time within which the United States is required to file a complaint for forfeiture of the Subject Properties, up to and including May 19, 2024.

8. This motion is made in good faith and is not made to delay the action, or for any other improper purpose.

9. As Section 983(a)(3)(A) provides that an order extending the initial 90-day period for filing a complaint must be entered by the Court, even if the parties have agreed to such extension, the parties respectfully request that the Court issue an order extending the time for filing the complaint against the Subject Property up to and including May 19, 2024, to allow the parties sufficient time to conduct informal discovery and to engage in settlement negotiations.

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10. For the Court's convenience, the parties will electronically submit a proposed Order Extending Time to File Complaint for Forfeiture.

DATED: February 5, 2024, at Honolulu, Hawaii.

CLARE E. CONNORS  
United States Attorney  
District of Hawaii

/s/ Andrew M. Kennedy  
ANDREW M. KENNEDY, ESQ.  
Attorney for Claimant  
WILLAM NAWELI

By /s/ Nicole Hudspeth  
NICOLE HUDSPETH  
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